

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW HAMPSHIRE**

KAREN TESTERMAN, ET AL.

PETITIONER(S),

v.

Case No. 1:24-cv-00020-LM-AJ

NH SECRETARY OF STATE, ET AL,

RESPONDENT(S).

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**PETITIONERS' MOTION FOR LEAVE TO FILE FIRST AMENDED VERIFIED  
COMPLAINT**

NOW COMES Republican primary voters Karen Testerman and NH state Representative David Testerman, (the "Petitioners"), pursuant to L.R. 15.1 (a), and respectfully submits this Motion for Leave to File an Amended Complaint ("Am. Compl."), stating as follows:

1. Petitioners Karen Testerman, individually and as former Chair of the Merrimack County Republican Committee; and her husband NH state representative David Testerman, individually and as a disenfranchised Merrimack County Republican primary voter, respectfully moves this Court for leave to file an amended complaint pursuant to LR 15.1.
2. The proposed amended complaint is attached hereto as Exhibit A.

**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing was sent by electronic means to:

David Scanlan, Respondent  
Secretary of State  
ATTENTION: Brendan Avery O'Donnell  
Election Law Unit Chief  
New Hampshire Department of Justice  
1 Granite Place, Concord, NH 03301  
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Chris Ager, Co-Respondent  
Chairman, New Hampshire Republican State Committee  
ATTENTION: Attorney Bryan K. Gould  
c/o CLEVELAND, WATERS, AND BASS, P.A.  
2 Capitol Plaza  
Concord, NH 03302-1137

Dated: March 20, 2024

  
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Karen Testerman, pro se

3. The proposed amended complaint seeks to clarify certain factual allegations and add additional claims arising from recent discovery. The amendments do not incorporate any part of the prior pleading by reference.

WHEREFORE, Petitioners respectfully request that this Court grant leave to file the amended complaint and attach Exhibit A as part of the motion.

Respectfully Submitted,

DAVID TESTERMAN, *N.H. State Representative, Merrimack County District 03*

Dated: March 20, 2024

By:   
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KAREN TESTERMAN, *both individually and as former New Hampshire Merrimack County Republican Committee (MCRC) Chair*

Dated: March 20, 2024

By:   
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